

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>BRADLEY ADAMS</b>	<b>:</b>	<b>VIOLATIONS:</b> 18 U.S.C. § 1343 (wire fraud - 3 counts) 18 U.S.C. § 1341 (mail fraud - 3 counts)

**I N F O R M A T I O N**

**COUNTS ONE THROUGH THREE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. Defendant BRADLEY ADAMS resided in the Eastern District of Pennsylvania and was a registered stock broker who traded through the Wyndham Financial Group, a sole proprietorship owned and operated by defendant ADAMS, and was an independent contractor for Brookstreet Securities Corp. located in Irvine, California.
2. Defendant BRADLEY ADAMS maintained an account in his name and trading as Wyndham Financial Group at the Harleysville National Bank and Trust Company (“Harleysville Bank”) in Harleysville, Pennsylvania.

### **THE SCHEME**

3. From in or about June 2000, to in or about September 2003, defendant

#### **BRADLEY ADAMS**

devised and intended to devise a scheme to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

It was part of the scheme that:

4. Defendant BRADLEY ADAMS obtained from twelve individuals (“the victims”) approximately \$569,809.76 by falsely representing that he had a good short-term investment opportunity that would yield a high rate of return, or would otherwise invest their money on their behalf.

5. Defendant BRADLEY ADAMS caused the victims to give him funds for investment purposes either by wiring the money to his account at the Harleysville Bank or by mailing or hand-delivering checks to him at his residence in Lower Gwynedd, Pennsylvania.

6. Defendant BRADLEY ADAMS falsely represented to the victims that their money had been invested on their behalf, and gave some of the victims false account statements or stock certificates that reflected that their money had been so invested.

7. Defendant BRADLEY ADAMS did not invest the funds given to him by the victims, but instead misappropriated the funds for his own use.

8. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

#### **BRADLEY ADAMS,**

for the purpose of executing the scheme, caused to be transmitted by means of wire

communication in interstate and foreign commerce, writings, signs, signals, pictures or sounds, that is, caused the victims identified below to wire transfer funds from their banks to the Harleysville Bank account of defendant ADAMS as follows:

<b>Count</b>	<b>Date</b>	<b>Victim</b>	<b>Amount</b>	<b>From</b>
1	5/29/02	M.R.	\$20,500	Commerce Bank Cherry Hill, NJ
2	2/21/03	K.M.	\$35,000	Firstbank Breckenridge, CA
3	4/9/03	B.B.	\$40,000	Wachovia Bank Naples, FLA

All in violation of Title 18, United States Code, Section 1343.

**COUNTS FOUR THROUGH SIX**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 2 and 4 through 7 and Counts One through Three are realleged here.

2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

**BRADLEY ADAMS,**

for the purpose of executing this scheme, and attempting to do so, knowingly caused to be delivered by United States mail according to the directions thereon, as indicated below, to or from defendant ADAMS at a certain address in the 1200 block of Kingsley Court in Lower Gwynedd, Pennsylvania, 19002, the following items:

<b>Count</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Item</b>
1	11/15/02	victim A.B., Drums, PA	defendant ADAMS	check for \$7,230
2	2/4/03	defendant ADAMS	victim K.H., Chalfont, PA	false tax receipt
3	3/28/03	victim D.K., Chicora, IL	defendant ADAMS	check for \$6,632

All in violation of Title 18, United States Code, Section 1341.

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**PATRICK L. MEEHAN  
UNITED STATES ATTORNEY**